

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

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|----------------------|---|-----------------------|
| In re: |) | Chapter 7 |
| |) | |
| Rodney Gerald Young, |) | |
| |) | |
| |) | Case No. 22-30551-KLP |
| |) | |
| |) | |
| Debtor. |) | |

**TRUSTEE’S MOTION TO EXTEND TIME TO OBJECT
TO THE GRANTING OF THE DEBTOR’S DISCHARGE
AND TO EXTEND TIME TO FILE A COMPLAINT
OBJECTING TO DISCHARGE AND NOTICE THEREOF**

Peter J. Barrett, Chapter 7 Trustee in the above-captioned case of Rodney Gerald Young (the “Debtor”), hereby requests this Court to defer the granting of a discharge to the Debtor’s and extend the time to file a complaint objecting to the discharge to and including October 31, 2022 pursuant to Rules 4003 and 4004 of the Federal Rules of Bankruptcy Procedure, and in support thereof, states as follows:

1. On or about March 4, 2022 (the “Petition Date”), the Debtor filed for relief pursuant to Chapter 7 of the Bankruptcy Code, 11 U.S.C. §§ 101, et seq. (the “Bankruptcy Code”).
2. Peter J. Barrett, Trustee (the “Trustee”) was appointed interim trustee and serves as Trustee in this case.
3. The §341 meeting of creditors (the “341 Meeting”) was held on April 12, 2022 and adjourned to May 3, 2022, June 7, 2022, August 9, 2022, and September 13, 2022 to allow the Trustee time to receive and review additional requested documents.
4. The current date by which parties must object to the granting of the Debtor’s discharge and file a complaint objecting to the Debtor’s discharge is September 30, 2022.

5. The Trustee requests that the Debtor's discharge be deferred and the time to object to the Debtor's discharge be extended through and including October 31, 2022 to allow the Trustee to receive and review the requested documentation and to conduct any additional adjourned 341 Meetings with respect to the same.

6. Pursuant to Local Rule of Bankruptcy Procedure 9013-1(G), and because there are no novel issues of law presented, the Trustee requests that the requirement that all motions be accompanied by a written memorandum be waived.

WHEREFORE, the Trustee hereby requests this Court to enter an Order, deferring the Debtor's discharge and extending the time to object to the Debtor's discharge through and including October 31, 2022 and awarding any further relief the Court deems proper.

PETER J. BARRETT, TRUSTEE

By: /s/ Peter J. Barrett
Trustee

Peter J. Barrett (Va. Bar No. 46179)
Kutak Rock LLP
901 East Byrd Street, Suite 1000
Richmond, Virginia 23219
Telephone: (804) 644-1700
Telecopy: (804) 783-6192
peter.barrett@kutakrock.com
Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of September, 2022, a true and correct copy of the foregoing Amended Trustee's Motion To Extend Time To Object To The Granting Of The Debtor's Discharge And To Extend Time To File A Complaint Objecting To Discharge was served via ECF/U.S. Mail to:

Katherine Montgomery, Esquire
Office of the United States Trustee
701 East Broad Street, Suite 4304
Richmond, VA 23219

James E. Kane
Kane & Papa, PC
1313 East Cary Street
P.O. Box 508
Richmond, VA 23218
Counsel for Debtor

/s/ Peter J. Barrett
22Trustee